

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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United States of America,

Case No. 21-cr-108(PAM/TNL)

Plaintiff,

v.

NOTICE OF INTENT  
TO OFFER PERTINENT TRAIT  
CHARACTER EVIDENCE

Thomas Lane,

Defendant.

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The Government will be required to prove willful intent, willfully failing to aid Floyd, acting with deliberate indifference to his serious medical needs.

With respect to any criminal intent, knowledge, and reasonable force, Thomas Lane intends, pursuant to Rules 404(a)(2)(A), 405(b), and 406 of the Federal Rules of Evidence, to put his pertinent trait of character for empathy, compassion, and being a good Samaritan police officer into evidence.

Lane will offer a body worn camera along with a transcript of him on January 23, 2020 at 3:40 a.m. working as a trainee officer. The body worn camera will show the jury that on this date and time Thomas Lane was involved in an encounter with a homeless Black individual in a wheelchair. The gentleman, named Quinton, was alone in his motorized wheelchair with a dead battery. Lane proceeded to assist the man and ultimately walked, pushing the wheelchair, through a snow, ice, rain mixture in the January winter cold to the police precinct where the gentleman could rest inside a warm building while his motorized wheelchair charged.

This specific instance of conduct of Lane's character will be strong circumstantial evidence that Lane did not with criminal intent assist in the murder of George Floyd.

Dated this 29<sup>th</sup> day of December, 2021.

Respectfully submitted,

s/Earl P. Gray  
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